Case 1:22-cr-00504-VSB Document 16APPLOICA2FION GRIANTED ice of Meredith S. Heller PLLC SO ORDERED

Law Office of Meredith S. Heller PLLC

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January 10, 2023

VIA ECF

Honorable Vernon S. Broderick United States District Court Southern District of New York 40 Foley Square New York, New York 10007

RE: United States v. Justin Ramirez

22-cr-504 (VSB)

Dear Judge Broderick,

VERNON S. BRODERICK U.S.D.J. 1/12/2023 The status conference scheduled for January 13, 2023, is hereby adjourned to February 17, 2023, at 10:00 a.m. The adjournment is necessary to allow the defense to assess the implications of Mr. Ramirez's state case for the defense of

this matter. The Court finds that the ends of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between January 13, 2023, and February 17, 2023, is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), in the interest of justice. So ordered.

This letter is submitted on behalf of my client, Justin Ramirez. Mr. Ramirez seeks a 30day adjournment of the status conference, currently scheduled for January 13, 2023, at 4:00, on the consent of the government. This adjournment is requested because Mr. Ramirez's state case, which shares a similar factual predicate to the instant case, it scheduled for trial on February 9, 2023, in New York Supreme Court, Bronx County. This adjournment will permit the parties to be better informed regarding the outcome of the state matter. The defense consents to the exclusion of time pursuant to the Speedy Trial Act, 18 U.S.C. § 3161.

Thank you for considering this request.

Respectfully Submitted,

Meredith S. Heller

Cc: A.U.S.A. Brandon C. Thompson (via ECF)